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May 15, 2013

**VIA ELECTRONIC FILING AND REGULAR MAIL**

Hon. Karen M. Williams, U.S.M.J.  
Mitchell H. Cohen Federal Courthouse, Room 2040  
1 John F. Gerry Plaza  
Camden, New Jersey 08101

RE: Daniel Freid v New Jersey State Police  
Dkt. No. 11-cv-02578 (RMB)

Dear Judge Williams:

I represent the remaining defendants in the above referenced matter. Pursuant to the most recent Scheduling Order issued by the Court, the deposition of plaintiff's police practices expert, Joseph Stine, is scheduled to take place on May 23, 2013. Thereafter, dispositive motions are to be filed by June 24. I write the Court seeking a short extension of those dates based upon the following circumstances.

As a result of exposure to the defoliant, Agent Orange, while in Viet Nam between 1967 and 1969, I contracted both arteriosclerotic heart disease and diabetes for which I receive compensation. In January 2009, I underwent angioplasty during which 3 stents were placed in 2 separate coronary arteries which were approximately 99% blocked.

About two months ago, I began noticing symptoms similar to those leading to that catherization and over this past weekend they intensified. Yesterday, I went to my primary physician, who did an EKG, and then sent me to my cardiologist. The cardiologist has advised me to visit the emergency room of Clara Mass Hospital today to be admitted for another angioplasty. He also advised me to do nothing stressful or exert myself during the interim.



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Accordingly, I respectfully request that the Court extend these dates for at least two weeks at this time to account for my medical condition. I anticipate a return to work on May 28, subject to my physical condition and the directions of my surgeon and cardiologist. If that return date proves to be too optimistic, I will communicate with the Court immediately so that further adjustment of the scheduling can take place, if necessary. I have not communicated these circumstances to opposing counsel prior to this communication because they were both unexpected and occurred very rapidly once I contacted my primary physician yesterday morning for an appointment.

I thank the Court for its consideration of this request and its understanding of the situation.

Respectfully submitted,

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ATTORNEY GENERAL OF NEW JERSEY

By: s/Vincent J. Rizzo, Jr.  
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cc: Aaron Freiwald, Esq.  
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